

UNITED STATES DISTRICT COURT  
Western District of Massachusetts

KEITH BRIAN ASKINS

Plaintiff

V.

WILLIAM C. WERNICKI TRUCKING

Defendant

Civil Action No.: 04-30178-KPN

DEFENDANT WILLIAM C. WERNICKI  
TRUCKING'S MOTION FOR  
ENLARGEMENT OF TIME ON  
CONSENT

The undersigned counsel for the defendant, William C. Wernicki Trucking, with the consent of counsel for all parties, hereby moves for a partial enlargement of the scheduling order approved by the Court on January 7, 2005 and extended by the Court by order dated July 8, 2005. The defendant, William C. Wernicki Trucking moves for a partial enlargement so as to extend by thirty (30) days the time limitations related to the completion of all discovery. The request for an enlargement of time would result in the following time deadline:

1. All discovery shall be completed by November 8, 2005;

In support hereof, the undersigned counsel represents that the parties have taken the depositions of the plaintiff, defendant and one (1) witness in this case. The deposition of the witness which was taken on September 27, 2005 has resulted in the names of two (2) other potential witnesses. The defendant would like to inquire of these witnesses what they know and

what they saw. The depositions of these witnesses may be needed and a subpoena must be served upon them to compel their appearance. The parties anticipate that these two (2) additional depositions will be scheduled within thirty (30) days. The parties will need the additional thirty (30) days as requested to complete these depositions.

This is the second motion for extension of time relating to this scheduling order in this case.

Counsel for the plaintiff consents to the enlargement of time sought by this Motion.

ATTORNEY FOR THE PLAINTIFF

Keith Brian Askins

Consents:



Walter Stewart, Esq.

293 Bridge Street, Ste 326

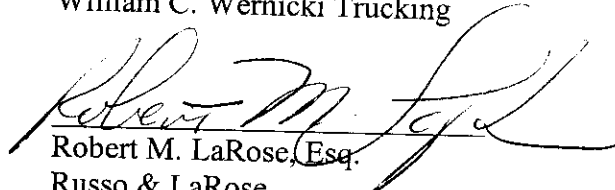
Springfield, MA 11103

(413) 746-0060

BBO# 548570

ATTORNEY FOR THE DEFENDANT,

William C. Wernicki Trucking



Robert M. LaRose, Esq.

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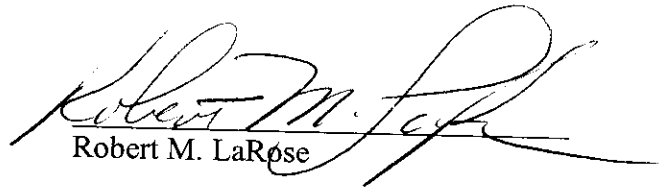
(860) 368-5070

BBO#543711

**CERTIFICATE OF SERVICE**

I, Robert M. LaRose, Esq., do hereby certify that a copy of this Motion for Enlargement of Time has been sent to the following counsel of record via first class mail on October 3, 2005, as follows:

Walter Stewart, Esq  
293 Bridge Street, Suite 326  
Springfield, MA 11103

  
Robert M. LaRose